

REMARKS

The present amendment is submitted in an earnest effort to advance this case to issue without delay.

1. The Examiner may wish to acknowledge the claim for priority under 35 USC 119, sections 119(a) through (d) or (f) in the parent application Ser. No. 09/311,197. It is noted that there is no priority acknowledgment in paragraph 12 of PTOL 326.

2. The specification amendment in the present case is intended to satisfy the requirements of the Examiner in paragraphs 1, 3, 4, 5 and 7 of the detailed action.

A cross reference has been provided to the parent application, the benefit of which under 35 USC 120 has already been acknowledged in the filing receipt. The fact that the parent application has issued as a patent has also been acknowledged.

In addition, reference characters 24, 64a through 64e, 65, 92 and 94 have been provided in the specification to satisfy the requirement of paragraph 5 on page 3 of the detailed action. Reference characters 20, 96 and 100 appear respectively on page 17, line 1, page 17, line 3 and page 17, line 8 of the specification.

There is attached a copy of page 17 which may have been omitted in whole or in part in any scanned version with which the Examiner may have been supplied. This copy should satisfy the requirement in paragraph 7 of the detailed action as well.

3. There are enclosed three sheets of drawing, properly marked as replacement sheets in which corrections have been made to FIGS. 2,3, 5, 6 and 17. The lining tube has been labeled 37a in FIGS. 5 and 6 to correspond to the reference character now used in the specification, the extra reference numeral 37 has been deleted in FIG. 3 ands FIGS. 1 and 2 have been separated. In FIG. 17 the reference character 82 has been added. The changes to the specification and drawing contain no new matter.

4. The claims have been amended to eliminate all of the informalities noted by the Examiner with respect to antecedent bases and the like. Claims 42 and 43 are properly drafted as method claims.

All the claims in this case have been rejected as being anticipated by PORTMAN ET AL Patent No. 6,561,289 or as being obvious from that reference in combination with a secondary reference. Claim 46 is rejected as anticipated by DOREL Patent No. 6,047,784.

All of the claims in the case are directed to a downhole system in which there is a circulation downwardly through the annulus between the tubing and the borehole then up through the tubing view the pump means.

That is not taught in either of the primary references and would not be obvious from the combination of the primary references with the second reference.

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Fluid is pumped down a supply line 20 to a fluid accumulator 92 located upon the well head 94. The fluid is then pressurised and passes into the pressure lock chamber 96 and flows down into the borehole 70, in the annulus formed around the coiled tubing 23. The fluid passes into the drill  
5 bit 22 and thence up through the coiled tubing and back to the vessel for filtering and recirculating. The pressure lock chamber included dynamic seals 98 which allow the coiled tubing to be fed into the borehole whilst the pressure is maintained. Pump, motor and traction units 100 aid the fluid flow as well as altering the weight on bit.

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Alternative embodiments using the principles disclosed will suggest themselves to those skilled in the art, and it is intended that such alternatives are included within the scope of the invention, the scope of the invention being limited only by the claims.

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What is claimed is:

1. An apparatus for downhole drilling of wells comprising;  
20 a drilling unit comprising a drill bit for penetrating into a rock formation,  
  
a motor arranged to drive the drill bit, the motor including a hollow shaft which permits the passage of fluid therethrough,  
  
25 tubing upon which the drilling unit and motor are suspended,

Accordingly, all of the claims in the case ought to be considered to be allowable.

Respectfully submitted,  
The Firm of Karl F. Ross P.C.



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Enc: Page 17 of Specification  
3 Replacement Sheets

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**DRAWING AMENDMENTS**

**Note the attached three replacement sheets.**